

Message

From: Daniel Liebowitz [Daniel.Liebowitz@allnex.com]
Sent: 6/19/2020 12:54:53 PM
To: Bauer, Jeff [Bauer.Jeff@epa.gov]
Subject: RE: P18-0325

Hi Jeff,

I just re-submitted the revised PMN via CDX. The following information was added:

Notes:

1. Manufacturing equipment is cleaned out once per year after all batches in the manufacturing campaign are completed. The vessel is gravity drained from the bottom valve. A loss frequency for clean-out of a single vessel should be 0.2%.

2. The final product containing the PMN substance is package in ~75% drums and 25% 5-gallon pails.

Note-There is no CBI in this email.

Regards,
Dan

From: Bauer, Jeff <Bauer.Jeff@epa.gov>
Sent: Thursday, June 18, 2020 4:14 PM
To: Daniel Liebowitz <Daniel.Liebowitz@allnex.com>
Subject: RE: P18-0325

Dan,

I am attaching a copy of the exposure report, it dose not have any CBI in it, Looking at the numbers you provide below I am not sure that would be enough to mitigate the Gen Pop risk.

The assessment for Gen pop risk using the 0,15 mg/kg/day for drinking water and 1.3 mg/kg/day (yellow hightligts) for fish ingestion from Manufacturing.

Drinking water adult	MOE 71.42
Drinking Water infant	MOE 17.01
Fish Ingestion	MOE 8.12

Need to be above 100 to mitigate the risk.

The 0.53 mg/kg/day (blue highlight) fish ingestion during processing may be cutting it close also if the MFG fish ingesting can be mitigated.

Your NPDES # is only like 300,000 gallons more than what we predicted with the SIC code. (quick math)

The MFG equipment cleaning information will help and you will need to send that thru CDX so I can have the engineer see it. During Processing the only release is from Drums and if want to break that down to the percent shipped in drums and the % shipped in 5 gallon pails. I am hoping the engineer will do 1% loss in pails and the usual 3% in drums.

Sent it thru CDX and I can get the reports updated and hopefully we can mitigate the Gen Pop risk.

Jeff

Jeff Bauer - Program Manager
United States Environmental Protection Agency (USEPA)
Office of Pollution Prevention and Toxics (OPPT)
New Chemicals Program (7405M)
<http://www.epa.gov/oppt/newchemicals/>

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From: Daniel Liebowitz <Daniel.Liebowitz@allnex.com>
Sent: Thursday, June 18, 2020 2:14 PM
To: Bauer, Jeff <Bauer.Jeff@epa.gov>
Subject: RE: P18-0325

Jeff,

The NPDES Permit data for the manufacturing site for P18-0325 is as follows:

NPDES# CT0000086
Average flow about 1.1 MGD
Typical Max 1.7 MGD
Permitted Max 4.3MGD
Permitted Avg 2.3MGD

Equipment clean-out takes place once per year not after each batch. Vessel is drained from the bottom valve with a LF=0.2% vs a LF=1%.

I also confirmed P18-0325 is package in drums and pails. Use of Totes is not a viable option.

Regards,
Dan

From: Bauer, Jeff <Bauer.Jeff@epa.gov>
Sent: Wednesday, June 17, 2020 7:50 PM
To: Victor, Meg <Victor.Meg@epa.gov>; Daniel Liebowitz <Daniel.Liebowitz@allnex.com>
Subject: RE: P18-0325

[EXTERNAL] Email from outside allnex. Be careful with links and attachments.

Dan, is on my call sheet for today, like I mentioned yesterday, My computer has been uploading all morning since 8 am and my computer is just now up and running. Still need to get in to the CBI LAN.

Dan I will call you this afternoon to go over the case and see how we can address the gen pop concerns. ,

Jeff

Jeff Bauer - Program Manager
United States Environmental Protection Agency (USEPA)
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From: Victor, Meg <Victor.Meg@epa.gov>
Sent: Wednesday, June 17, 2020 9:46 AM
To: Daniel Liebowitz <Daniel.Liebowitz@allnex.com>
Cc: Bauer, Jeff <Bauer.Jeff@epa.gov>
Subject: RE: P18-0325

Hi Dan,

There are also risks identified to the general population via ingestion. I'm copying Jeff Bauer on this email. I recently took on some different responsibilities (still in the new chemicals program though), and Jeff has kindly taken on several of the PMNs, including this one.

Best,
Meg
(202) 343-9193

From: Daniel Liebowitz <Daniel.Liebowitz@allnex.com>
Sent: Wednesday, June 17, 2020 8:59 AM
To: Victor, Meg <Victor.Meg@epa.gov>
Subject: P18-0325

Hi Meg,

We have another very similar substance that would need TSCA registration to the substance covered under P18-0325 with a suspended PMN review. I believe there were aquatic toxicity and inhalation concerns for P18-0325. What would be required to move forward with P18-0325?

Daniel Liebowitz
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